

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

M.H.,)
)
 Plaintiff,) No. 12-cv-08523
)
 v.) Hon. Andrea R. Wood
)
 CRAIG FINDLEY, in his official capacity as)
 Chairman of the Ill. Prisoner Review Bd., *et al.*)
)
 Defendants.)

DEFENDANTS' MOTION TO TERMINATE CONSENT DECREE

Defendants Craig Findley, Chairman of the Illinois Prisoner Review Board, and Heidi Mueller, Director of the Illinois Department of Juvenile Justice, both named in their official capacities, by and through their attorney, Illinois Attorney General Kwame Raoul, move for termination of the consent decree (Dkt. No. 72) in this matter. In support of this motion, defendants state as follows:

1. On October 23, 2012, plaintiffs filed this lawsuit asserting constitutional and state-law challenges to the parole revocation process as it pertains to youth who are placed on parole throughout the State of Illinois.
2. To resolve this matter, the parties entered into a consent decree, which the Court approved on August 28, 2014 (Dkt. No. 72).
3. The consent decree provides for monitoring by an independent monitor, followed by a twelve-month period of monitoring by class counsel solely for the purposes of ensuring compliance with the decree. (Dkt. No. 72 at ¶39)

4. On October 12, 2018, the Court entered an order terminating the independent monitoring provisions of the consent decree. (Dkt. No. 122)

5. The twelve-month period of class counsel monitoring has now also concluded. Plaintiffs have not moved to extend class counsel's monitoring, and class counsel did not notify undersigned counsel of any issues regarding compliance with the consent decree during their twelve-month monitoring period.

6. In accordance with paragraph 39 of the consent decree, the Court should terminate the consent decree. (Dkt. No. 72 at ¶39 ("This Consent Decree shall terminate upon the conclusion of Class Counsel's Monitoring."))

WHEREFORE, for the foregoing reasons, this Court should enter an order terminating the consent decree.

Dated: November 6, 2019

KWAME RAOUL
Attorney General of Illinois

Respectfully submitted,

/s/ Michael T. Dierkes

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